

**FILED**

SEP 19 2022

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**JOHNNY LEE SUMMERS,**

**Defendant.**

**Case No. 22-CR-165-GKF**

**SUPERSEDING INDICTMENT**

**[COUNTS ONE, TWO, and  
THREE: 18 U.S.C. §§ 2251(a) and  
2251(e) – Production of Child**

**Pornography;**

**COUNT FOUR: 18 U.S.C. §  
2422(b) – Coercion and Enticement  
of a Minor;**

**COUNT FIVE: 18 U.S.C. §§ 1151,  
1153, and 2243(a) – Sexual Abuse of  
a Minor in Indian Country; and**

**COUNT SIX: 18 U.S.C. §§ 1151,  
1153, and 2244(a)(3) – Abusive  
Sexual Contact with a Minor in  
Indian Country]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[18 U.S.C. §§ 2251(a) and 2251(e)]**

From on or about January 1, 2021, to on or about March 10, 2021, in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, employed, used, persuaded, induced, enticed, and coerced N.H., a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, and were

mailed, transported and transmitted using a means and facility of interstate and foreign commerce and in or affecting interstate commerce, including by computer and cellular phone.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT TWO**  
**[18 U.S.C. §§ 2251(a) and 2251(e)]**

From on or about January 1, 2021, to on or about April 20, 2021, in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, employed, used, persuaded, induced, enticed, and coerced N.H., a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, and were mailed, transported and transmitted using a means and facility of interstate and foreign commerce and in or affecting interstate commerce, including by computer and cellular phone.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT THREE**  
**[18 U.S.C. §§ 2251(a) and 2251(e)]**

From on or about January 1, 2021, to on or about May 18, 2021, in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, employed, used, persuaded, induced, enticed, and coerced N.H., a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, and were mailed, transported and transmitted using a means and facility of interstate and foreign commerce and in or affecting interstate commerce, including by computer and cellular phone.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT FOUR**  
**[18 U.S.C. § 2422(b)]**

From in or about February 2021 to in or about January 2022, in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, used a facility and means of interstate and foreign commerce, to persuade, induce, and entice, and attempt to persuade, induce, and entice, J.H., a child known to the Grand Jury, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

**COUNT FIVE**  
**[18 U.S.C. §§ 1151, 1153, and 2243(a)]**

From in or about February 2021 to in or about January 2022, within Indian Country in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, an Indian, knowingly engaged in, and attempted to engage in, a sexual act with J.H., a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **SUMMERS**.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2243(a).

**COUNT SIX**  
**[18 U.S.C. §§ 1151, 1153, and 2244(a)(3)]**

From in or about February 2021 to in or about January 2022, within Indian Country in the Northern District of Oklahoma, the defendant, **JOHNNY LEE SUMMERS**, an Indian, knowingly engaged in and caused sexual contact with J.H., a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **SUMMERS**.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2244(a)(3).

CLINTON J. JOHNSON  
United States Attorney

A TRUE BILL



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VALERIA LUSTER  
Assistant United States Attorney

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*/s/ Grand Jury Foreperson*  
Grand Jury Foreperson